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JAMES E. JOHNSON
Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**

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April 8, 2021

BY ECF

Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED: The Clerk of Court is directed to mail a copy of this endorsement to the Plaintiff.

APPLICATION GRANTED

Katharine H. Parker

Hon. Katharine H. Parker, U.S.M.J.

04/08/2021

Your Honor:

I am an Assistant Corporation Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, and attorney for City of New York (“City”), Captain Mitchell, Captain Gustave, Correction Officer Humphries, Correction Officer Young, and Correction Officer Mayo (“defendants”) in the above-referenced action. I write to request that Mr. Aaron Davison, of this Office, be granted permission to conduct Plaintiff’s deposition. Mr. Davison has passed the New York state bar exam and is pending admission. Mr. Davison will be supervised by the undersigned at the deposition.

By way of background, Plaintiff alleges that, on March 1, 2019, Defendants escorted him to a search area and used excessive force by punching him in the back and leaving him in handcuffs for thirty (30) minutes. (ECF No. 2.) Afterwards, Plaintiff further alleges that Defendants placed him in a cell with no mattress, bedframe, or seat for five hours and delayed medical treatment. (ECF No. 2.)

Since February 2021, Mr. Aaron Davison has handled this matter under my supervision. He has reviewed all discovery and attended the most recent conference. As such, he is familiar with the facts and procedural progression of the case. Accordingly, I respectfully request that Mr. Aaron Davison be granted permission to conduct Plaintiff’s deposition under the direct supervision of the undersigned.

Sincerely,

Kathleen D. Reilly

Kathleen D. Reilly
Assistant Corporation Counsel

cc: **By First Class Mail**

Shaquille Dinkins, *Plaintiff pro se*
DIN: 19A2359
Wende Correctional Facility
3040 Wende Road
Alden, New York 14004-1187

DECLARATION OF SERVICE BY MAIL

I, **KATHLEEN D. REILLY**, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that on April 8, 2021, I served the annexed **NOTICE OF DEPOSITION, LETTER, MOTION FOR LEAVE TO DEPOSE, AND PROPOSED ORDER** upon Shaquille Dinkins, *pro se* plaintiff in the matter, Shaquille Dinkins v. City of New York, et al., No. 19 Civ. 2336 (GBD) (KHP), by depositing a copy of same, enclosed in a first-class, postpaid, properly addressed envelope in a post office/official depository under the exclusive care and custody of the United States Postal Service, within the State of New York, directed to the plaintiff in the address listed below, that being the address designated by plaintiff for that purpose:

Shaquille Dinkins, *Plaintiff pro se*

DIN: 19A2359

Wende Correctional Facility
3040 Wende Road
Alden, New York 14004-1187

Dated: New York, New York
 April 8, 2021



Kathleen D. Reilly¹
Assistant Corporation Counsel

¹ This case has been assigned to Assistant Corporation Counsel Aaron Davison, who passed the New York State Bar Exam and is presently applying for admission. Mr. Davison is handling this matter under supervision and may be reached at (646) 988-3220 or adavison@law.nyc.gov.